

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

JERMAINE ROGERS,

Plaintiff,

v.

Case No. 15C0765

JOHN ASHWORTH, et al.,

Defendants.

DEFENDANT'S RULE 26(a)(3)(A) AND (B) DISCLOSURES

Defendant, by his attorneys, Attorney General Brad D. Schimel and Assistant Attorneys General Laure Rakvic-Farr and Shannon A. Conlin, submit their Rule 26(a)(3)(A) and (B) Disclosures.

NAMES OF POTENTIAL WITNESSES

1. Plaintiff (adversely)
2. All individuals who were defendants at any time in this case, including, but not limited to, the following:

- a. Nathaniel Christensen
c/o Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
608-266-1677

b. Anthony Ashworth
c/o Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
608-266-1677

c. Randy Schneider
c/o Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
608-266-1677

3. Other potential witnesses:

- a. Nicholas Buhr, Psy. D.
- b. Kim Campbell
- c. Joanne Lane

Each of the above-listed witnesses are or were employed by the Department of Corrections during the relevant time, and can be contacted through the Wisconsin Department of Justice:

Post Office Box 7857
Madison, WI 53707-7857
608-266-1677

Joanne Lane is elderly and currently residing in Duluth, MN. Therefore, her testimony would be presented by telephone or videoconferencing.

Dr. Nicholas Buhr is also currently working for the US Public Health and Safety with the NAVY, and is stationed in San Diego. Therefore, his testimony would be presented by either telephone or videoconferencing.

4. Witness potentially needed for authentication of documents:
Isaac Hart and any medical provider providing treatment for Plaintiff from February 29, 2012 through May 1, 2012.

The above-listed witnesses may be contacted through defense counsel.

The defendant reserves the right to call any of plaintiff's witnesses adversely.

In addition, based upon the presentation of plaintiff's case, defendant reserves the right to call rebuttal witnesses.

EXHIBITS

The Defendant's exhibit list will be filed as a separate document on today's date.

Dated this 19th day of January, 2018.

Respectfully submitted,

BRAD D. SCHIMEL
Wisconsin Attorney General

s/Laure Rakvic-Farr
LAURE RAKVIC-FARR
Assistant Attorney General
State Bar #1049540

SHANNON A. CONLIN
Assistant Attorney General
State Bar #1089101

Attorneys for Defendant

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 266-0323 (Rakvic-Farr)
(608) 266-1677 (Conlin)
(608) 267-8906 (Fax)
rakvic-farrlc@doj.state.wi.us
conlinsa@doj.state.wi.us